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March 20, 2017

BY ECF

The Honorable Peggy Kuo
United States Magistrate Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: Lilya Pilipenko, et al. v. City of New York, et al., 15 Civ. 6053 (NG) (PK)

Your Honor:

I am a Senior Counsel in the Special Federal Litigation Division of the New York City Law Department and the attorney assigned to the defense of the above-referenced matter on behalf of defendants City of New York, Richard Moore, Krzysztof Koncewicz, Kaiyuen Leung, Yevgeniy Ivankovskiy, Craig Melamed, Nicholas Felix and Michael Spessard. Defendants write on consent to respectfully request a two-week extension of time, from March 22, 2017 until April 5, 2017, for the parties to file their joint proposed schedule for depositions in the matter. The reason for this request is that the matter is currently being transferred to another attorney in this office as the undersigned is transferring at the end of this week to a different office in the New York City Law Department. Accordingly, the enlargement of time will enable this office to transfer the matter to another attorney, who then will have the opportunity to meet and confer with plaintiffs' counsel regarding deposition dates. Counsel for plaintiffs consent to this request, and this is the first request for an extension of time to file the parties' joint proposed schedule for depositions.

Defendants thank the Court for its time and consideration of the within request.

Respectfully submitted,

/s/

Philip S. Frank
Senior Counsel

cc: (all parties) Via ECF